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United States Department of the Interior

Fish and Wildlife Service

Pennsylvania Field Office
Superfund Coordinator
EPA Region III (3HW13)
841 Chestnut Building
Philadelphia, Pennsylvania 19107

March 4, 1994

Memorandum

To: Richard Fetzner, On-Scene Coordinator (3HW32)
Thru: Biological Technical Assistance Group
Attn: Robert Davis, Coordinator
From: Robert Burr, Environmental Contaminants Specialist
Subject: Lehman MTBE Site, Lehman, Pennsylvania

Your draft February 23, 1994 memorandum indicates you intend to conduct response actions that could effect Lehman Swamp in Lehman, Luzerne County, Pennsylvania. The Biological Technical Assistance Group (BTAG) offers suggestions on studies and changes to proposed actions that will assist making decisions as to the need for a proposed action and what should be done to mitigate the environmental effect, if any, of the action. These comments do not constitute the response of the federal natural resource trustees to your proposed actions.

Before initiating any response action in wetlands, BTAG recommends reviewing results of the following:

- a geophysical study investigating the extent of methyl tert-butyl ether (MTBE) and assessing if and where discharges occur to the Swamp; and,
- surface water and wetland sediment results of one sample taken by the Technical Assistance Team (TAT) during a January 21, 1994 site visit.

BTAG also recommends, as part of the TAT recommended Spring 1994 reassessment of the Swamp, conducting whole sediment and sediment pore water bioassays of Lehman Swamp and a reference wetland. Swamp samples should be taken from first the known area of

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previous oil contamination and second, if different from the first area, in the lowest part of the wetland immediately down gradient of wetland seeps from which oil is suspected to have discharged.

Regarding the remediation of ground water, BTAG concurs with the TAT recommendation in their February 15, 1994 "Wetlands Assessment Trip Report" that in lieu of a slurry wall an in-line filter systems or scrubbers be used to remove the MTBE and hydrocarbons without disturbing the flow of water to the Swamp.

BTAG infers from your February 23, 1994 memorandum that installation of a water line may affect the Swamp. If construction of the line will impact the Swamp, BTAG recommends every means be used such as realigning the water line route to first avoid and then minimize wetland impacts. If wetlands will be impacted by any site action, not just the water line, then BTAG requests that the type and amount of wetland impacted be characterized and quantified, respectively.

If you have any questions concerning these comments, please contact me at extension 3155.